

II. General Allegations

5. Plaintiff, Melitte Harrison, was hired by Defendant Polk County Election Commission during April of 2009, as Deputy Registrar of the Polk County Election Commission of Polk County, Tennessee.

6. During November of 2010, Plaintiff was promoted to the position of Registrar or Administrator of Elections.

7. During 2010, Plaintiff was involved in three (3) successful elections as either the Deputy Registrar or the Administrator of Elections.

8. During her employment, Plaintiff performed her job duties acceptably within the guidelines established by Defendant and generally applicable to its employees. Plaintiff's performance during her employment was objectively successful and she was never subjected to discipline.

9. During her employment Defendant's commissioners (management) made e-mail communications evidencing a bias against females and an intent to replace Plaintiff with a male employee.

10. In April of 2011, Plaintiff was terminated from her employment.

11. Plaintiff was replaced by a male employee, Mr. Steve Gaddis. Mr. Gaddis had previously been terminated from the Election Commission for poor performance.

12. Ms. Gaddis was less qualified for the position than Plaintiff, and was placed into the position because he was a male.

III. Cause of Action

13. Plaintiff charges and alleges that because of the sex or gender based discrimination to which she was subjected, Defendant is guilty of violations of Title VII of the

Civil Rights Act of 1964, 42 U.S.C. § 2000e, *et seq.*

14. Plaintiff charges and alleges that because of the sex or gender based discrimination to which she was subjected, Defendant is guilty of violations of the Tennessee Human Rights Act, T.C.A. § 4-21-101, *et. seq.*

IV. Damages

15. As a direct and proximate result of the acts and omissions of the Defendant, Plaintiff has suffered lost wages, mental pain and suffering, embarrassment, humiliation and general damages.

V. Relief Sought Against Defendant

WHEREFORE, Plaintiff, prays that proper process issue and be served upon the Defendant in this action in the manner prescribed by law; and

WHEREFORE, Plaintiff demands judgment against the Defendant for compensatory damages, reasonable attorney fees and all costs; and

WHEREFORE, Plaintiff demands a jury to try all issues, when joined.

RESPECTFULLY SUBMITTED:

PATY, RYMER & ULIN, P.C.

By:



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